

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

- against -

THEODORE ROXFORD a/k/a LAWRENCE
DAVID NIREN and HOLLINGSWORTH,
ROTHWELL & ROXFORD

Defendants.

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**NOTICE OF MOTION TO DISMISS ON BEHALF OF
HOLLINGSWORTH, ROTHWELL & ROXFORD**

PLEASE TAKE NOTICE that, upon the annexed affidavits of Kenneth Rothwell, witnessed on August 29, 2007 and Hugh Hollingsworth, sworn to on August 28, 2007, the annexed Memorandum of Law, and upon the Complaint herein, Defendant Hollingsworth, Rothwell & Roxford will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time designated by the Court, for an order pursuant to Federal Rule of Civil Procedure 12(b)(3), dismissing the complaint in this action on the ground that venue is improper.

Dated: August 30, 2007

THE ROTH LAW FIRM, PLLC

By: 

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